

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

ROALE CONSTANTINE MCCALLA,

Also known as "Rohan Campbell"  
and "Pony Hype,"

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

LISA DUFFY, being duly sworn, deposes and states that she is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about December 24, 2012, within the Eastern District of New York, the defendant ROALE CONSTANTINE MCCALLA, also known as "Rohan Campbell," and "Pony Hype" did willfully and knowingly use a false, forged, counterfeited, mutilated, or altered passport or instrument purporting to be a passport.

(Title 18, United States Code, Section 1543).

**To be Filed Under Seal**

**COMPLAINT AND**  
**AFFIDAVIT IN**  
**SUPPORT OF**  
**APPLICATION FOR**  
**ARREST WARRANT**

(18 U.S.C. § 1543)

17-MJ-897

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") and have served that role for approximately two years. As a Special Agent with HIS, I am responsible for investigating criminal violations of the United States' immigrations laws, including passport fraud. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. On or about October 22, 2012, the defendant ROALE CONSTANTINE MCCALLA, also known as "Rohan Campbell," and "Pony Hype" (the "defendant"), a citizen of Jamaica, applied for a United States passport at the United States Post Office located at Hartford, Connecticut. In support of the application, the defendant provided a New York State Birth Certificate and state-issued Connecticut identification card in the name of "Rohan Anthony Campbell." The defendant was issued a United States passport in the name of Rohan Anthony Campbell, with passport number 496480943 (the "Campbell Passport") on November 5, 2012.

3. On or about December 24, 2012 the defendant used the Campbell Passport to travel from John F. International Airport ("JFK Airport") in Queens, New York to

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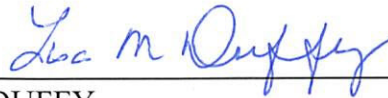
<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Kingston, Jamaica. Additionally, the defendant used the Campbell Passport to return from Jamaica to JFK Airport on or about January 16, 2013.

4. I have reviewed the application for the Campbell Passport. The application contained a photograph for the Campbell Passport (the “Campbell Passport Photograph”). I compared the Campbell Passport Photograph with a photograph of the defendant (the “Jamaican Passport Photograph”) that was attached to an application submitted by the defendant in about 2010 to the Jamaican government for a passport in the name of “Roale Constantine McCalla.” Based on my comparison of: (1) the Campbell Passport Photograph, (2) the photograph on the Connecticut identification card in the name of “Rohan Anthony Campbell” submitted in support of the Campbell Passport application and (3) the Jamaican Passport Photograph, I have determined that that the individual in the Campbell Passport Photograph is the ROALE CONSTANTINE MCCALLA.

5. In addition, based on the biographical information, including date of birth, social security number and place of birth provided in the Campbell Passport application, I have identified an individual named “Rohan Anthony Campbell” with a date of birth, social security number and place of birth that matches the Campbell Passport application. I have reviewed a photograph of that individual associated with his New York State driver’s license and can confirm that that individual, Rohan Anthony Campbell, is not the individual depicted in the Campbell Passport Photograph.

WHEREFORE, your deponent respectfully requests that the defendant ROALE CONSTANTINE MCCALLA, also known as "Rohan Campbell," and "Pony Hype", be dealt with according to law. Your deponent further respectfully requests that this Complaint and Affidavit in Support of Application for an Arrest Warrant and the related Arrest Warrant be filed under seal as a public filing of these documents may alter the target of the government's investigation to the existence of the investigation and may result in his flight and/or the destruction of evidence.



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LISA DUFFY  
Special Agent, Homeland Security Investigations

Sworn to before me this  
13th day of October, 2017

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THE HONORABLE PEGGY KUO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK